

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA

FILED
U.S. DISTRICT COURT
AUGUSTA DIV.

2020 DEC 16 A 9:17

CLERK 
SO. DIST. OF GA.

PAMELA SWAIN

CV620-82

vs.

HARVEY WEINSTEIN; THE WEINSTEIN
COMPANY; ANTHONY ROBBINS; ALAN
DERSHOWITZ; CLIFF CONLEY;
RENEA WASSON; TONY JORDAN;
ANGELA SNYDER; EVANS COUNTY
SCHOOLS.

AMENDED COMPLAINT

Throughout the past 6 years, this defendants has weaponized everything against the plaintiff, Pamela Swain as a means of punishment from criminal convict, Harvey Weinstein, who has used his monetary resources to harass and coerce the defendant into a forced sexual relationship. After Judge Christopher Ray dismissed the last complaint, the defendant contacted the plaintiff with assertions to rape the plaintiff who as of August 1st, 2020, is a federal employee.

1. IN FEBRUARY 2018, the defendant was sued by Ragan and Ragan for an East Georgia Medical charge. The bill clearly showed double and even triple payment for services which was illegal, but Judge William Kicklighter sided with Ragan and Ragan saying, "The defendant failed to show". The defendant sent in a brief but was told by the Tattnall Magistrate clerk that she did not have to show up for the court

date violating the age-old legal rule of giving legal advice from a federal or state legal body.

2. NOVEMBER 2019, Judge Eddie Anderson sided with lawyers for Harvey Weinstein against placing a restraining order on the convicted criminal even though ample evidence was available to prove he was obsessively enamored with the defendant and had made criminal death and rape threats for over 4 years.
3. Judge Christopher Ray dismissed a complaint without letting the plaintiff proceed with her case.
4. NOW, the court has Ragan and Ragan again suing the defendant for an imaginary GM Financial bill from NeSmith Chevrolet now know as Layne Durrence Chevrolet. Pictures and emails are available that Martin NeSmith, Ashley NeSmith, and Jess Durrence (former employees of NeSmith/Layne Durrence) have repeated maliciously attacked the defendant by trespassing on her property and destroying her property. The defendant has consulted with the Tattnall County Sheriff and has found that they are colluding with wealthy criminals to harass the defendant. These people have abilities to destroy people's vehicles. The plaintiff's car was vandalized 3 times. There are police reports of Ashley NeSmith following the plaintiff around and a photo of a NeSmith vehicle with Martin NeSmith following the plaintiff around.
5. AUGUST 1ST.2020, The plaintiff became a federal employee for the US Census and then continued to receive harassment. Shanna Waters (at the behest of Harvey Weinstein) contacted the plaintiff and demanded sexual favors.

UPDATE OF HARASSMENT

6. The plaintiff's work was interrupted as spoken in the letter. The defendants contacted the plaintiff's place of work and instructed them to sexually harass her. Angela Snyder was contacted and instructed to slander the plaintiff and sexually harass her.
7. The plaintiff is currently seeking a doctoral degree at Ashford University. Alan Dershowitz, Bernadette Marson, Heather Zelenski, Tony Robbins, and a new defendant, "Richard Grannon", have been trying to upend the plaintiff's degree by having her flunked without any basis. The new defendant added "Alan Dershowitz" has been unknowingly allowed to "grade" the plaintiff's papers and deride her still on the Kiwi Farms website that continues to exist and has not been removed. HE HAS ALSO BEEN IMPERSONATING OR PLAYING AN ASHFORD INSTRUCTOR.
8. Harvey Weinstein, who he and his lawyer have been saying is on death's door, was harassing the plaintiff on Kiwi Farms again with no sign of illness, frailty, or disease.

Her private address and location has been published on a public social media harassment site Kiwi Farms with the intent to rape. Martin NeSmith, Ashley NeSmith, and Demere NeSmith have criminal history background and have engaged in criminal stalking and following for Harvey Weinstein who contacted all people for which the defendant worked. Harassment emails from these people trying to force the defendant to buy a car from them exist just recently before this financial charge.

Going back to 2014/2015, a person contacted the plaintiff with the intention to coerce her in to a prostitution situation. Since then, Harvey Weinstein and Tony Robbins has sent several messages identifying themselves as harassers, deviants, and stalkers. These messages include pictures, kidnapping and rape threats (even while Weinstein was in prison) and unwanted nude photos as recent as September 2020 while the plaintiff was a federal employee of the US

CENSUS. They have contacted the plaintiff's family members, employers, clients, and personal accounts with the intent to force her into a sexual relationship. Evidence is available to all this.

Several attacks on vehicles while the plaintiff worked for the government occurred.

With the addition of new defendants, restraining orders on the following are asked:

Harvey Weinstein

The Weinstein Company

Anthony "Tony" Robbins

Alan Dershowitz

Renea Wasson

Cliff Conley

Mandy Waters

Shanna Waters

Keith Kennedy

Angela Snyder

Toney Jordan

Gloria Reveure

Since the plaintiff is not focusing on money, 2 million from each of them for lost wages, harassment, emotional damages, and mental/physical health problems (they received unapproved

access to the plaintiff's medical records claiming to be her husband) be awarded as monetary deterrent again harassing the plaintiff again.

The recent list has been added as the added people have been activated by Tony Robbins to sexually harass the plaintiff and keep her from gainful employment. A few have sought to victimize the plaintiff by spreading fake nude pics of her in the community (revenge porn). Others have slandered the plaintiff for Dershowitz and Robbins. Snyder, Revuere, and Jordan hatched a plan to sexually harass the plaintiff at Evans County Schools. The school district keeps them employed.

Georgia law codes in use or violated:

2015 Georgia Code

Title 16 - CRIMES AND OFFENSES

Chapter 11 - OFFENSES AGAINST PUBLIC ORDER AND SAFETY

Article 2 - OFFENSES AGAINST PUBLIC ORDER

§ 16-11-39.1 - Harassing communications.

2010 Georgia Code

TITLE 16 - CRIMES AND OFFENSES

CHAPTER 5 - CRIMES AGAINST THE PERSON

ARTICLE 7 - STALKING

§ 16-5-91 - Aggravated stalking

O.C.G.A. 16-14-9 (2010)

16-14-9. Civil remedies as supplemental and not mutually exclusive

O.C.G.A. 16-6-23 (2010)

16-6-23. Publication of name or identity of female raped or assaulted with intent to commit rape

(a) It shall be unlawful for any news media or any other person to print and publish, broadcast, televise, or disseminate through any other medium of public dissemination or cause to be printed and published, broadcast, televised, or disseminated in any newspaper, magazine, periodical, or other publication published in this state or through any radio or television broadcast originating

in the state the name or identity of any female who may have been raped or upon whom an assault with intent to commit the offense of rape may have been made.

A handwritten signature in black ink, reading "Pamela D Swain". The signature is written in a cursive style with a horizontal line underneath the entire name.

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Southern District of Georgia
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